

June 28, 2017

Mr. Jeffrey K. Warmann  
President and CEO  
Monroe Energy, LLC  
4101 Post Road  
Trainer, PA 19061-3812

Re: Operating Permit - Correction  
TVOP No. 23-00003  
APS ID 786636, AUTH ID 1156874 and 1156877  
Trainer Borough  
Delaware County

Dear Mr. Warmann:

Enclosed, please find the pages with corrections made to:

1. Page 147, Condition #005 for Source ID 130. The condition is corrected to read:  
  
This source shall only be used during FCC unit (Source ID 101) start-up **and warm idle operation**.
2. Page 304, Source ID 735. The NOx emission limit of 0.25 lbs/MMBtu was removed, since this limit was not in the permit conditions for the source (pages 228 through 231).

If you have any questions concerning the terms and conditions of this permit, please contact me at 484.250.5920.

Sincerely,



James A. Beach, P.E.  
Environmental Engineer Manager  
New Source Review Section  
Air Quality

Enclosures

cc: EPA Region III  
Division of Permits  
District Supervisor  
Ms. Sun (scanned copy)  
File Nos. 23-00003  
Re 30 (NM17) 178-03

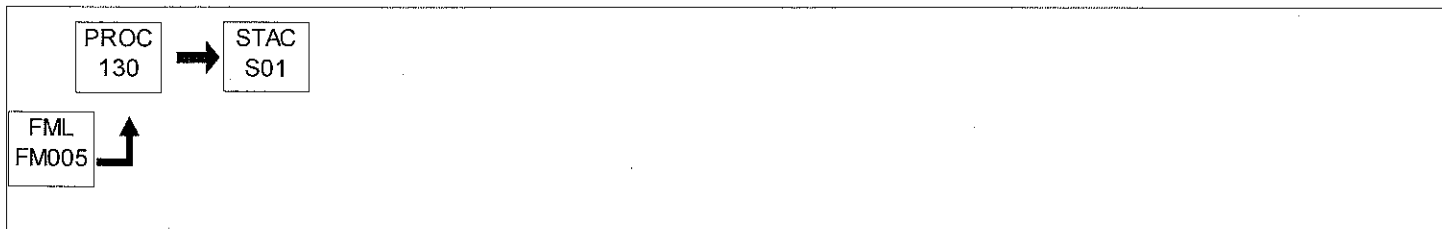
**SECTION D. Source Level Requirements**

Source ID: 130

Source Name: PEABODY HEATER

Source Capacity/Throughput: 74.000 MMBTU/HR

74.000 MCF/HR NATURAL GAS

**I. RESTRICTIONS.****Emission Restriction(s).****# 001 [25 Pa. Code §123.13]****Processes**

No person may permit the emission into the outdoor atmosphere of particulate matter from this process in a manner that the concentration of particulate matter in the effluent gas exceeds 0.04 grain per dry standard cubic foot.

**# 002 [25 Pa. Code §123.21]****General**

No person may permit the emission into the outdoor atmosphere of sulfur oxides from this source in a manner that the concentration of the sulfur oxides, expressed as SO<sub>2</sub>, in the effluent gas exceeds 500 parts per million, by volume, dry basis.

**# 003 [25 Pa. Code §129.99]****Alternative RACT proposal and petition for alternative compliance schedule.**

NO<sub>x</sub> emissions from this heater shall not exceed 7.6 tons per 12-month rolling sum.

**Fuel Restriction(s).****# 004 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

The source shall fire natural gas only.

**Throughput Restriction(s).****# 005 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

This source shall only be used during FCC unit (Source ID 101) start-up and warm idle operation.

**II. TESTING REQUIREMENTS.**

No additional testing requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

**III. MONITORING REQUIREMENTS.****# 006 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

[Additional authority of this condition is also derived from 25 Pa. Code §129.100.]

The permittee shall monitor for this source:

(a) The operating hours; and

(b) The amount of fuel consumed using either a fuel flow meter, or based on the operating hours and maximum heat input.

**SECTION D. Source Level Requirements****IV. RECORDKEEPING REQUIREMENTS.****# 007 [25 Pa. Code §127.441]****Operating permit terms and conditions.**

[Additional authority of this permit condition is also derived from 25 Pa. Code §129.100.]

The permittee shall keep the following records of this source:

- (a) The operation hours each day the source is operating.
- (b) The amount of fuel consumed each day the source is operating, using a flow meter, or based on the operating hours and maximum heater input.
- (c) The average firing rate in MMBtu/hr each month and the NO<sub>x</sub> emissions on a monthly and 12-month rolling basis.
- (d) The maintenance conducted on the source and air pollution control devices.

**V. REPORTING REQUIREMENTS.**

No additional reporting requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

**VI. WORK PRACTICE REQUIREMENTS.****# 008 [25 Pa. Code §129.99]****Alternative RACT proposal and petition for alternative compliance schedule.**

[Additional authority of this condition is also derived from 25 Pa. Code §129.97(d).]

The permittee shall operate and maintain this unit in accordance with manufacturer's specifications and good operating practices for the control of emissions from this unit.

**VII. ADDITIONAL REQUIREMENTS.**

No additional requirements exist except as provided in other sections of this permit including Section B (Title V General Requirements).

**\*\*\* Permit Shield in Effect. \*\*\***

**SECTION F. Emission Restriction Summary.**

Source Id	Source Description		
93.300	Tons/Yr	12-month rolling sum	TSP
8.100	Tons/Yr	12-month rolling sum	VOC
102	CLAUS SULFUR RECOV. PLT.		
Emission Limit		Pollutant	
250.000	PPMV	at 0% excess air	SOX
0.040	gr/DRY FT3	Particulate Matter	TSP
103	MAIN FLARE		
Emission Limit		Pollutant	
1.300	Tons/Day		NOX
69.000	Tons/Yr		NOX
0.500	Tons/Day		SOX
25.000	Tons/Yr		SOX
104	MARINE VESSEL BALLASTING		
Emission Limit		Pollutant	
9.200	Tons/Yr		VOC
113	LPG RECOVERY UNIT		
Emission Limit		Pollutant	
4.600	Tons/Yr		VOC
118	RAILCAR LOADING LPG & BUTANE		
Emission Limit		Pollutant	
3.940	Tons/Yr	12-month rolling total	VOC
119	PLATFORMER REGENERATOR		
Emission Limit		Pollutant	
0.370	Tons/Yr		Hydrochloric Acid
130	PEABODY HEATER		
Emission Limit		Pollutant	
7.600	Tons/Yr	12-month rolling sum	NOX
138	#153 EXT.FLOAT 53M BBLS		
Emission Limit		Pollutant	
0.700	Tons/Yr		VOC
139	#154A INT. FLOAT 105M BBLS		
Emission Limit		Pollutant	
4.000	Tons/Yr		VOC

**SECTION F. Emission Restriction Summary.**

Source Id	Source Description		
165	#93 EXT.FLOAT 244M BBL		
Emission Limit		Pollutant	
6.500 Tons/Yr	12-month rolling sums	VOC	
166	#94 EXT.FLOAT 243M BBL		
Emission Limit		Pollutant	
6.500 Tons/Yr		VOC	
194	#160 INT. FLOAT 85 MBBLs		
Emission Limit		Pollutant	
0.300 Tons/Yr		VOC	
733	FCCU FEED HEATER		
Emission Limit		Pollutant	
33.100 Tons/Yr		CO	
12.480 Tons/Yr		NOX	
3.000 Tons/Yr		PM10	
2.200 Tons/Yr		VOC	
735	KEROSENE/HCN HTU HEATER		
Emission Limit		Pollutant	
12.090 Tons/Yr		CO	
14.320 Tons/Yr		NOX	
736	DIESEL HTU HEATER		
Emission Limit		Pollutant	
14.200 Tons/Yr	12-month rolling sum	CO	
24.360 Tons/Yr	12-month rolling sum	NOX	
1.500 Tons/Yr	12-month rolling sum	PM10	
3.400 Tons/Yr	12-month rolling sum	VOC	
737	NAPHTHA HDS HEATER		
Emission Limit		Pollutant	
0.200 Lbs/MMBTU	refinery fuel gas	NOX	
738	PLATFORMER FEED HEATER		
Emission Limit		Pollutant	
48.000 PPMV	12-month rolling average	Hydrogen Sulfide	
0.120 Lbs/MMBTU		NOX	
317.000 Tons/Yr		NOX	
0.100 Lbs/MMBTU		PM10	
0.011 Lbs/MMBTU	12-month rolling average	SOX	